

Storage and Disposal Activities in Phase II

To address storage and disposal issues, several activities took place during Phase II of the CLI, including:

- # primary research and data analysis of the quantitative survey with regard to storage and disposal issues,
- # mini focus group research in the qualitative study of Phase II,
- # information requests and literature reviews on storage and disposal issues,
- # independent studies and research,
- # information exchanges through the CLI Storage and Disposal Subgroup, and
- # data gathering regarding household hazardous waste (HHW) management programs.

A brief description of each of these activities is provided below. Learnings from each of these activities are presented separately following the summary of storage and disposal activities.

North American Hazardous Materials Management Association (NAHMMA) Annual Meeting

The EPA held a session on storage and disposal during the North American Hazardous Materials Management Association (NAHMMA) annual meeting in San Diego on November 19, 1997⁹. Approximately 20 to 30 people attended the session. The EPA gave a brief overview of the CLI and the issues surrounding storage and disposal information on product labels in particular. The session was opened to the audience, which consisted primarily of individuals concerned with product (as opposed to container) disposal, to gather participants' opinions on how storage and disposal issues may be addressed on product labels.

North American Hazardous Materials Management Association (NAHMMA) Mailing

An information request was distributed by the NAHMMA to its 300 members. The request contained six questions regarding:

- # requirements, policies, and programs for disposing of pesticide and hard surface cleaner containers and unused product;
- # requirements, policies, and programs for recycling pesticide and hard surface cleaner containers;

⁹ NAHMMA is a non-profit association of individuals, businesses, governmental, and non-profit officials, dedicated to pollution prevention and reducing hazardous components entering municipal waste streams from households, small businesses, and other entities.

- # recycling of aerosol cans;
- # interviewee participation in local hazardous waste pick-up days or amnesties for pesticide and hard surface cleaners containers and unused product;
- # interviewee participation in recycling programs for empty aerosol and plastic containers; and
- # common practices for storage of pesticides and hard surface cleaners.

Appendix 6-1 contains a copy of the questions mailed to NAHMMA members.

Chemical Specialties Manufacturers Association (CSMA) and Household and Institutional Products Information Council (HIPIC) Members' Presentations

Member companies of the Chemical Specialties Manufacturers Association (CSMA) and the Household and Institutional Products Information Council (HIPIC) presented findings on research on disposal of products manufactured by CSMA and HIPIC companies, to the EPA in May 1998.^{10,11} The presentations included results of:

- # environmental risk assessments on disposal of consumer products, such as “down the drain” products, to publicly owned treatment works (POTWs), municipal solid waste landfills (MSWL), and septic systems;
- # aerosol recycling; and
- # trends in household insecticide technology, and how this pertains to safety and HHW considerations.

For copies of the CSMA and HIPIC presentations, please refer to EPA’s Public Docket Administrative Record AR-139.

The Waste Watch Center (WWC) Report on Household Hazardous Waste (HHW) Management Programs

The Waste Watch Center (WWC) compiled information on a number of HHW programs in the United States for the EPA. WWC is a non-profit organization that has been collecting

¹⁰ CSMA is a voluntary nonprofit trade association of some 400 companies engaged in the manufacture, formulation, distribution, and sale of non-agricultural pesticides, antimicrobials, detergents and cleaning compounds, industrial and automotive specialty chemicals and polishes, and floor maintenance products for household, institutional, and industrial uses.

¹¹ HIPIC, formed in 1994, was established to provide fact-based information on the proper use, storage, disposal, and recycling of household and institutional products. Its membership includes many suppliers and manufacturers of household and institutional products.

information on HHW collection programs since 1988. Three main sets of data were provided by the WWC:

- # a comprehensive listing of HHW programs in the United States as of 1997;
- # a summary of state regulations that prevent HHWs from being placed in the trash; and
- # a listing of non-regulatory measures by state, local, and regional governments to encourage HHWs to either be re-used, recycled, or managed as hazardous waste.

For a copy of the WWC report, please refer to the EPA Public Docket Administrative Record AR-139.

Discussion Paper Evolving from the 1995 Cleaning Products Summit

Representatives from state and local organizations in the CLI Subgroup provided a previously prepared paper entitled “Concerns with Household Cleaning Products — A White Paper,” to the CLI Subgroup for discussion and information. (The Subgroup was never able to discuss the paper in detail, however.) The paper outlines health and environmental concerns regarding household hazardous products, including household cleaning products. The paper addressed concerns regarding methods of disposal for household hazardous products: in particular, how disposal practices have adversely affected HHW management programs.

For a copy of the discussion paper, please refer to the EPA Public Docket Administrative Record AR-139.

Telephone Conversations

In addition, the EPA spoke by telephone with several professionals in the hazardous waste management and recycling fields, and the EPA’s Regional offices, including the following:

- # officials in state or regional hazardous waste departments;
- # waste materials handlers (e.g., people working in recycling or material recovery companies);
- # individuals at trade associations (e.g., the Steel Recycling Institute (SRI) and the American Association for Plastic Container Recovery (AAPR); and
- # EPA Regional office personnel.

The primary goal of these calls was to gain a variety of perspectives about storage and disposal requirements or problem areas surrounding these issues.

For a listing of individual and/or organizations contacted by telephone, and/or copies of some of the transcripts from the telephone conversations, please refer to the EPA Public Docket Administrative Record AR-139.